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SOUND SHORE SALVAGE, INC. d/b/a SEA TOW WESTERN LONG ISLAND SOUND,

Plaintiff.

10 civ 5042 (JGK)

Schooleley Order,

-against-

M/Y SEA YA LATER, her engines, generators, fishing gear, tenders, electronics, interior appointments, appurtenances, etc., in rem, MOHAMMAD QURESHI, in personam, and ROSHAN QURESHI, in personam,

Defendants.

REPORT OF PARTIES' PLANNING MEETING AND PARTIES'JOINT PROPOSED CASE MANAGEMENT PLAN

Pursuant to Fed. R. Civ. P. 16(b) and 26(f), a conference was held on September 2, 2010. The participants were:

- John Fulweiler, Esq. of DeOrchis & Partners, LLP, on behalf of Plaintiff
 Sound Shore Salvage, Inc. d/b/a Sea Tow Western Long Island Sound; and
- 2. Michael E. Stern, Esq. of Rubin, Fiorella & Friedman, LLP on behalf of Defendants Mohammad Qureshi and Roshan Qureshi.

I. Certification

The undersigned counsel certify that, after consultation with their clients, they have discussed the nature and basis of the parties' claims and defenses and any possibilities for achieving a prompt settlement or other resolution of the case and, in consultation with their clients, have developed the following proposed case management plan.

II. Case Management Plan

A. Scheduling Conference with the Court

A pretrial conference with the Court is scheduled for Tuesday, September 7, 2010 at 4:30 P.M.

B. Joinder of Parties and Amendment of Pleadings

The parties may join additional parties or amend the pleadings consistent with the Federal Rules of Civil Procedure and the Local Rules for the United States District Court for the Southern District of New York.

C. <u>Discovery</u>

1. Discovery Phases

Discovery will not be conducted in phases.

2. Initial Disclosures

The parties must make the initial disclosures required by Rule 26 on or before, Tuesday, September 21, 2010.

3. All Fact Discovery

All fact discovery will be completed no later than Friday, December 10, 2010.

- 4. Expert Discovery
- a. Plaintiff will serve its expert disclosures no later than Friday, January 14, 2011.
- b. Defendant will serve its expert disclosures no later than Friday, February 11, 2011.
- c. All depositions of expert witnesses will be completed no later than Friday, March 11, 2011.

5. Summary Judgment and Pre-Motion Conference

Any party wishing to move for summary judgment must request a pre-motion conference with the Court no later than Friday, March 18, 2011. The parties agree to abide by the briefing schedule established by the Court and/or agreed to by the parties at any scheduled pre-motion conference.

D. Settlement Conference

Following all discovery, all counsel must meet for at least one hour to discuss settlement, such conference to be held no later than TBD.

E. Trial by Magistrate Judge

At this time, the parties do not consent to disposition of this case by a Magistrate Judge pursuant to 28 U.S.C. § 636(c).

Dated: New York, New York September 2, 2010

DeOrchis & Partners, LLP Attorneys for Plaintiff

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